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By Federal Express

November 9, 1999

Office of Special Nutritionals (HFS-450) Center for Food Safety and Applied Nutrition U.S. Food and Drug Administration 200 C St. SW

Washington, DC 20204

RE: Notification for Certain Types of Statements on Dietary Supplements

Dear Sir or Madam:

As required by Section 403 (r)(6)(c) of the Food, Drug and Cosmetic Act, Pharmanex, Inc., 2000 Sierra Point Parkway, Brisbane, California 94005, intends to market a dietary supplement product with the following label statements of nutritional support:

Product identified as Siberian Ginseng with the following label statements:

- Provides nutritional support to combat stress related to active lifestyles.
- Improves oxygen and energy efficiency during stress.
- Physical and mental stress support.
- Provides dietary support as an adaptogen.
- As an adaptogen, Siberian Ginseng may promote the body's normal ability to handle the physical and mental demands of modern lifestyles.

I certify that the information contained in this notice is complete and accurate and that Pharmanex, Inc. has substantiation that these statements are truthful and not misleading.

Sincerely,

Carsten Smidt

Director of Nutrition Research

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